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20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO; et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

DECLARATION OF SARA NELSON

1 I, Sara Nelson, declare the following under penalties of perjury:

2 1. I am over 18 years of age and competent to provide this declaration. This declaration is
3 based on my personal knowledge, information, and belief.

4 2. I am the International President of the Association of Flight Attendants-CWA, AFL-
5 CIO (“AFA”), a labor union organized under the Railway Labor Act, 45 U.S.C. § 151, et seq. AFA
6 serves as the leading voice for a safe, healthy and secure aircraft cabin for passengers and crew alike.
7 AFA represents over 55,000 flight attendants at twenty airlines, including flight attendants employed
8 by Alaska Airlines, Hawaiian Airlines, United Airlines, and Avelo Airlines who are based in San
9 Diego, Los Angeles, Burbank, and San Francisco. I too have been flight attendant at United Airlines
10 since 1996.

11 3. AFA advocates for the rights, safety, and fair treatment of the employees our union
12 represents, serving as their officially recognized exclusive representative. AFA’s core functions include
13 providing guidance and resources to bargaining unit employees.

14 4. Maintaining aviation safety is fundamental to the flight attendant profession. Aviation
15 safety is the product of hundreds of thousands of workers – from engineers to mechanics to safety
16 inspectors, security officers, pilots, gate agents, baggage handlers, flight attendants, air traffic
17 controllers, and more – asking all day long “is it safe?” These workers collaborate with and rely upon
18 numerous services provided by the federal government, including services provided by the Federal
19 Aviation Administration (“FAA”). For example, FAA specialists are responsible for repairing air traffic
20 control facilities and updating digital maps for pilots. Meteorologists provide critical reports that help
21 navigate safe flights and avoid the dangers of turbulence that range in harm from air sickness and coffee
22 burns to serious injury and even death.

23 5. The mass termination program challenged in the above-captioned lawsuit threatens
24 imminent harm to AFA and our members. AFA is already observing the adverse effects of a diminished
25 workforce on the federal aviation system. Recent terminations of FAA employees have introduced
26 unnecessary risk and stress that distracts from the mission of safe flight for civil and military operations.
27 If FAA specialists cannot do their jobs, flight attendants cannot do our jobs. Further, chaotic workplaces
28 harm recruitment, training and retention of critical personnel.

1 6. In response to these developments, AFA has been forced to devote substantial resources
2 to requests and concerns from our members and provide guidance about how these developments may
3 affect workplace safety. Some flight attendants have decided to leave the profession altogether, citing
4 safety concerns. Others are facing pressure from their families to seek other jobs. These flight
5 attendants and many others understandably have asked questions—by email, in person, and by phone—
6 about the impact of these actions on the terms and conditions of their employment and on their rights.
7 Addressing this demand has required AFA leadership to work around the clock and to hire additional
8 personnel to help respond to these developments.

9 7. The mass termination program challenged by this lawsuit will delay plans to modernize
10 and improve infrastructure. The delays and impact on staffing could force cuts in the total number of
11 flights that can operate in certain airspace and at certain airports in order to maintain safety. This also
12 will disrupt AFA's members schedules and reduce the amount of work available to them.

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14 I declare under penalty of perjury under the laws of the United States that the foregoing is true
15 and correct. Executed this 6th day of March in Washington, DC.

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